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Attorneys for THE SPECIAL LITIGATION  
COMMITTEE OF THE BOARD OF DIRECTORS  
OF TRIDENT MICROSYSTEMS, INC.

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

IN RE TRIDENT MICROSYSTEMS,  
INC. DERIVATIVE LITIGATION

LEAD CASE NO. C06-3440-JF

This Document Relates to:

ALL ACTIONS.

**STIPULATION, APPLICATION AND  
~~{PROPOSED}~~ ORDER TO VACATE  
HEARING ON MOTION FOR  
PRELIMINARY APPROVAL AND TO  
RENEW MOTION TO (A) TERMINATE  
AND DISMISS AS TO ALL DEFENDANTS  
OTHER THAN FRANK C. LIN, AND  
(B) PRELIMINARILY APPROVE  
SETTLEMENTS**

**STIPULATION**

WHEREAS, lead plaintiffs Viken Kalindjian and Gerald W. Keeney, on behalf of themselves and all others similarly situated (“Lead Plaintiffs”), filed their First Amended Consolidated Verified Shareholder Derivative Complaint (“Amended Complaint”) on March 7, 2007;

WHEREAS, a Special Litigation Committee of the Board of Directors (the “SLC”) of nominal defendant Trident Microsystems, Inc. (“Trident,” together with the SLC and the Lead Plaintiffs, the “Parties”) has reached preliminary settlements with all individual defendants other than Frank C. Lin (“Mr. Lin”), and has determined that it is in Trident’s best interest to settle this action with respect to those defendants;

WHEREAS, Trident filed a Motion to (a) Terminate and Dismiss as to All Defendants Other Than Frank C. Lin and (b) Approve Settlements (the “Motion to Terminate and Approve Settlements”) on February 9, 2009, and noticed it for hearing on May 1, 2009;

WHEREAS, by stipulation and Order of the Court dated March 6, 2009, the May 1, 2009 hearing on the Motion to Terminate and Approve Settlements was vacated;

WHEREAS, all the Parties except Mr. Lin attended a full-day mediation on April 9, 2009, at which substantial progress was made toward a full settlement of the matter;

WHEREAS, the Parties attended a Further Case Management Conference on May 1, 2009, at which the Parties expressed hope of achieving a full settlement of this matter, and asked for a continuance of the Motion to Terminate and Approve Settlements to achieve that goal. At that Conference, the Court ordered that: (1) the Motion to Terminate and Approve Settlements be deemed withdrawn, (2) the parties prepare a Motion for Preliminary Approval of Settlement and (3) hearing of that motion be set for August 21, 2009;

WHEREAS, the Parties require time to brief the issues raised by a renewed Motion to Terminate and Approve Settlements (other than as to Mr. Lin);

WHEREAS, the Parties have continued to participate in settlement discussions in the hope of arranging a mediation in which Mr. Lin and Trident’s insurers would agree to participate and ultimately to reach a full resolution of this matter, but have not yet succeeded;

1 WHEREAS, no full settlement has been reached and the Parties have been unable to meet  
2 the August 21, 2009 date; and

3 WHEREAS, Lead Plaintiffs' counsel are completing their review of the materials  
4 provided to them by the SLC;

5 WHEREAS, Lead Plaintiffs, the SLC and Trident have agreed that, upon conclusion of  
6 that review, a renewed Motion to Terminate and Approve Settlements as to all defendants other  
7 than Mr. Lin is appropriate for presentation to the Court;

8 THEREFORE, IT IS STIPULATED AND AGREED AS FOLLOWS:

9 1. The August 21, 2009, hearing date for a Motion for Preliminary Approval of  
10 Settlement will be vacated.

11 2. The renewed Motion to Terminate and Approve Settlements will be set for  
12 October 9, 2009 at 9:00 a.m., or at such later date and time as the Court may order.

13 Dated: August 18, 2009

**DLA PIPER LLP (US)**

14 By: /s/  
15 DAVID F. GROSS  
16 Attorneys for Nominal Defendant  
17 TRIDENT MICROSYSTEMS, INC.

18 Dated: August 18, 2009

**BINGHAM MCCUTCHEN LLP**

19 By: /s/  
20 JOHN D. PERNICK  
21 Attorneys for THE SPECIAL LITIGATION  
22 COMMITTEE OF THE BOARD OF DIRECTORS  
OF TRIDENT MICROSYSTEMS, INC.

23 Dated: August 18, 2009

**COUGHLIN STOIA GELLER RUDMAN &  
ROBBINS LLP**

24 By: /s/  
25 ROBIN WINCHESTER  
26 Attorneys for LEAD PLAINTIFFS  
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1 I, DAVID F. GROSS, am the ECF User whose ID and password are being used to file this  
2 Stipulation, Application and [Proposed] Order to Vacate Hearing on Motion for Preliminary Approval  
3 and to Renew Motion to (a) Terminate and Dismiss as to All Defendants Other Than Frank C. Lin, and  
4 (b) Preliminarily Approve Settlements. In compliance with General Order 45, X.B., I hereby attest  
5 that ROBIN WINCHESTER and JOHN D. PERNICK have concurred in this filing.

6 DATED: August 18, 2009

7 By: \_\_\_\_\_/s/\_\_\_\_\_  
8 DAVID F. GROSS

11 **ORDER**

12 **IT IS SO ORDERED.**

13 DATED: 8/19/2009  
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15   
16 THE HONORABLE JEREMY FOGEL  
17 UNITED STATES DISTRICT JUDGE  
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